

Statement of Brooke Hundley

August 20, 2009

Taken by: Doug Adkins and Donna Hricisko

Doug Adkins opened by asking Brooke if there were any issues with Steve Phillips at the All Star Game weekend. Brooke responded she just came back from Legal services to obtain advice.

Brooke stated that during the day Steve had made many comments to her like "you're so pretty" you're so nice, I like you, etc... Brooke stated she felt very awkward with Steve saying these things to her.

After the game a group of employees gathered in the lobby of the Hotel Millennium for drinks. Steve asked Brooke another PA if they wanted a drink. Steve returns with only one drink and gave it to Brooke. Brooke questions the drink because it was extremely strong.

Brooke steps away to go to the ladies room which was quite a distance from the lobby. When Brooke comes out of the Ladies Room Steve Phillips is standing there. He asks her to come up to his suite then he kisses her.

Brooke goes back to the lobby area and tells Joya Caskey (Sr. Prod. Coord) how uncomfortable she felt around Steve Phillips (she did not tell Joya that he kissed her) Joya responded "get use to it" This is the culture at ESPN.

Brooke again mentioned this to Joya at Joya's going away party (she was relocating to Charlotte) and received no concern.

Brooke stated the evening at the Millennium Hotel once she got back into her room she called Steve in his room and was asking him "why me" he stated because I think you are pretty and I like you. Brooke then joined Steve in his hotel room. Doug Adkins asked what happened in the room she said we just talked and fooled around a bit. Doug stated Steve said they got naked..she said yes but did not have sex.

Brooke stated Steve starting texting her a lot with very graphic sexual text messages, after the evening in the hotel. Most of their conversing was through text messaging. He also was asking her if she was okay.

Brooke said she shared the information and a couple of text messages with co-worker Aaron Elser.

Brooke stated her and Steve met a couple of times in the parking lot at Target Department Store and had sex in the car. Brooke stated she felt the only way to stop it was to give in to him. It became a physical relationship at Target. On August 5, 2009 they were to meet at Target parking lot and Steve cancelled it, by calling her and stating they should

not meet. He also told her to delete text messages because you don't know who is snooping. Steve texted Brooke and told her someone called his wife and he got caught. He told her they needed to lay low for awhile.

Sunday - August 16, 2009 Steve and Brooke had an argument on the phone and Brooke was frustrated and confused, she told him he needed to just tell his wife he pursued her. Steve started to threaten her (don't you say anything to anyone) I could ruin you and your reputation. She became very frustrated and hung up on him.

They had a plan to meet in LA while he was out there for work and she would be going there for vacation. She was confused and frustrated. She texted Steve and said "why don't you just tell your wife. He said he can't.

Doug Adkins asked Brooke if she had spoken to Steve's wife or children. Brooke stated she has not.

Brooke wrote a letter to Steve wife describing the affair she was having with Steve. She drove to Wilton Connecticut to deliver the letter to his home address. She went to the house and stuck the letter in the door, and drove off. She parked down the bottom of the hill at a YMCA parking lot and realized she should have not left the letter, because she put it in an ESPN envelope it might be assumed it was for Steve and he would get it instead of his wife. While sitting in the parking lot she approached a high school girl and asked her if she knew the Phillips? The girl said she did...she knew Ryan, Steve's son. Brooke asked her if she gave her \$10.00 would she take Brooke's car and go to the Phillips home and get a letter that she left in the door. The girl stated she would. The high school girl then took Brooke's car and went to the Phillips home to retrieve the letter. As she was getting back in the car either Steve's wife or Steve himself came home and blocked the car that the girl was driving. She backed up the car and hit a large rock causing damage to the bumper.

She went to Legal Services on Thursday August 20, 2009 to obtain information on what to do. She wants this to end and was looking for a mediator to solve things between them. She did not come to Human Resources because these actions did not take place at work and they were consensual.

Hricisko, Donna

From: Hricisko, Donna
 Sent: Wednesday, August 26, 2009 4:09 PM
 To: Hundley, Brooke
 Subject: RE: Meeting today @ 10:00am
 Importance: High

Brooke, I have concerns with your refusal to discuss this matter any further. As you are aware, Doug Adkins and I met with you last Thursday in response to a complaint about you from Steve Phillips. During that conversation, you acknowledged having a consensual relationship with Steve which has since ended. Thereafter, I received from you a letter via interoffice mail with new assertions about Steve's behavior in St. Louis, which you had not mentioned during our Thursday meeting. Since receiving your letter, Doug Adkins has met with Steve who denies your assertions.

We would like to thoroughly investigate both yours and Steve's concerns, including the assertions in your letter. To do so, we need to meet with you to gather additional information. Your refusal to cooperate will impede our ability to conduct a full and thorough review. Accordingly, I request that you reconsider your decision and agree to a meeting.

I also want to reiterate the "no contact" directive that Doug and I gave both you and Steve last Thursday. This will allow you and Steve to focus on your respective jobs while this matter is under review.

Please let me know your decision on whether you will agree to meet.

Thank you,

-----Original Message-----

From: Hundley, Brooke
 Sent: Wednesday, August 26, 2009 8:35 AM
 To: Hricisko, Donna
 Subject: RE: Meeting today @ 10:00am

Hi Ms. Hricisko
 I am sorry, but I will not be able to attend this meeting today. On the advice of my legal counsel I will not be speaking to anyone about the events that have occurred between me and Mr. Phillips at this time. Thanks for understanding.

Brooke

-----Original Message-----

From: Hricisko, Donna
 Sent: Wednesday, August 26, 2009 4:48 AM
 To: Hundley, Brooke
 Subject: Meeting today @ 10:00am

Brooke confirming our meeting this morning at 10:00am...I am located in the Human Resources Dept building 9.

See you then..

Thank you

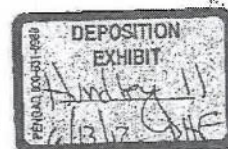
Donna Hricisko

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CONFIDENTIAL

ESPN-HUNDLEY00000193

To: Hricisko, Donna
Subject: Hundley Brock Letter to HR.doc

SENT VIA CERTIFIED
RETURN RECEIPT REQUESTED

September 15, 2009

Ms. Donna Hricisko
Human Resources
ESPN
ESPN Plaza
Bristol, CT 06010

RE: Your Employee: Brooke Hundley

Dear Sir/Madam:

Please be advised this office represents Brooke Hundley and that I am authorized to formally retract, withdraw and take back any and all claims, statements, letters, memos or complaints whether written or verbal, that she made to ESPN and its representatives, including but not limited to her supervisor(s); Steven Phillips' supervisors and/or ESPN's Legal Department or Human Resources Department, that in any way reference, involve or concern Steven Phillips or any alleged acts or omissions by Steven Phillips.

My client will not be discussing this matter with you whatsoever. If need be, you can contact me; however, I will assume that there is no need to.

Very truly yours,

Ralph C. Crozier
RCC:pc

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Adkins, Douglas G.

From: Hundley, Brooke
Sent: Thursday, September 17, 2009 9:58 AM
To: Adkins, Douglas G.
Subject: RE: Hundley Brook Letter to HR.doc

Ok thank you. I'll be speaking to my attorney as Mr. Phillips's attorneys should then be sending you the exact same statement.

From: Adkins, Douglas G.
Sent: Thursday, September 17, 2009 9:51 AM
To: Hundley, Brooke
Subject: RE: Hundley Brook Letter to HR.doc

The letter from your attorney is the first email on this chain. It retracts all statements along with written documents.

From: Hundley, Brooke
Sent: Thursday, September 17, 2009 9:44 AM
To: Adkins, Douglas G.
Subject: RE: Hundley Brook Letter to HR.doc

That is correct, just to elaborate the retraction is only regarding any written statements made to you about my encounter with Mr. Phillips, as any verbal statements would require a joint retraction by both parties. If you have any questions regarding what can and cannot remain on file, please contact my attorney for official clarification. Also, if you could please forward me a copy of the email for my records I would appreciate it, as I am well aware it was sent, but not the exact wording of the release, thank you.

From: Adkins, Douglas G.
Sent: Wednesday, September 16, 2009 12:13 PM
To: Hundley, Brooke
Cc: Hricisko, Donna
Subject: FW: Hundley Brook Letter to HR.doc

Brooke...We received an email from your attorney which states that you retract all your claims concerning Steve Phillips (see below). I assume that you received a copy of this email, and it accurately reflects your intent.

With your retraction, we conclude our review of this matter. Please note that you and Steve will continue to be subject to our "no contact" directive. You are to avoid any contact with each other, including verbal and written communications such as notes, texts and emails. From time to time, in the course of your ESPN employment, you may see each other or need to interact on a work-related basis. If so, you are expected to act professionally at all times and not discuss any personal matters of any kind. This directive applies to interactions between you and Steve while at work and on personal time. As you are aware, actions that occur outside of work may have work-related implications, which may require ESPN to take appropriate action in response.

If you have any questions or concerns, either now or in the future, please contact Donna Hricisko or me. If you would prefer to speak with another member of ESPN's Human Resources Department, then I can arrange for you to meet with another HR representative to have your concerns addressed.

Thank you,

Doug Adkins